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Attorney for Plaintiff
FARAHNAZ TAHMASEBI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 11/30/06

FARAHNAZ TAHMASEBI,

Plaintiff,

vs.
SUN MICROSYSTEMS, INC., a
California Corporation,

Defendant.

Case No. C05 05016 RMW

Date Action Filed: December 5, 2005

**STIPULATION AND [PROPOSED]
ORDER CONTINUING FURTHER CASE
MANAGEMENT CONFERENCE;
SUPPORTING DECLARATION**

**STIPULATION AND [PROPOSED] ORDER CONTINUING FURTHER
CASE MANAGEMENT CONFERENCE; SUPPORTING DECLARATION**

**DECLARATION OF DANIELLE OCHS-TILLOTSON
IN SUPPORT OF PROPOSED ORDER CONTINUING
FURTHER CASE MANAGEMENT CONFERENCE**

I, Danielle Ochs-Tillotson, hereby declare as follows:

1. I am an attorney with Foster & Associates representing defendant Sun Microsystems, Inc. in this action and have personal knowledge of the matters set forth herein and could and would testify thereto at any hearing of this matter.

2. This matter is set for a Further Case Management Conference on December 1, 2006 before this Court.

3. Frank Mayo, attorney for plaintiff Farahnaz Tahmasebi, has informed me that he intends to file a motion to withdraw from this matter as plaintiff's counsel of record (the "Motion").

4. Mr. Mayo represented to me that he would file the Motion sufficiently before the Further Case Management Conference scheduled in this matter for December 1, 2006, such that the Court could consider the issue when determining how to proceed.

5. Recently, Mr. Mayo informed me that due to scheduling conflicts, he did not file the Motion, but will do so on or before December 1, 2006.

6. For these reasons, Mr. Mayo and I have agreed to request that the Further Case Management Conference be continued to a date on or after the Court has ruled on the Motion.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29th day of November 2006 in Oakland, California.



Danielle Ochs-Tillotson


1 **STIPULATION RE CONTINUING**
2 **FURTHER CASE MANAGEMENT CONFERENCE**

3 For the reasons set forth in the attached Declaration of Danielle Ochs-Tillotson in Support
4 of Proposed Order Continuing Further Case Management Conference, plaintiff Farahnaz
5 Tahmasebi and Defendant Sun Microsystems, Inc., by and through their counsel, hereby stipulate
6 to request that the Further Case Management Conference set in this matter for December 1, 2006
7 be continued to a date on or after the Court has ruled on plaintiff's counsel Frank Mayo's Motion
8 to Withdraw. The parties respectfully request that the Court issue an Order adopting this
9 schedule.

10 SO STIPULATED.

11 Dated: November 29, 2006

FOSTER & ASSOCIATES

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13 MICHAEL W. FOSTER
14 DANIELLE OCHS-TILLOTSON
15 Attorneys for Defendant
SUN MICROSYSTEMS, INC.

16 Dated: November 29, 2006

LAW OFFICE OF FRANK E. MAYO

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18 FRANK E. MAYO
19 Attorney for Plaintiff
20 FARAHNAZ TAHMASEBI
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**[PROPOSED] ORDER CONTINUING
FURTHER CASE MANAGEMENT CONFERENCE**

For good cause showing, the Stipulation Re Continuing Further Case Management Conference is hereby adopted by the Court as its Order in this matter. A Further Case Management Conference will be held on 2/23/07 at 10:30 in Department 6 of this Court. The parties are ordered to comply therewith.

Dated: 11/30/06

/s/ Ronald M. Whyte
UNITED STATES DISTRICT COURT JUDGE